

WEIL, GOTSHAL & MANGES LLP
Richard W. Slack (*pro hac vice*)
(richard.slack@weil.com)
Jessica Liou (*pro hac vice*)
(jessica.liou@weil.com)
Matthew Goren (*pro hac vice*)
(matthew.goren@weil.com)
767 Fifth Avenue
New York, NY 10153-0119
Tel: 212 310 8000
Fax: 212 310 8007

KELLER BENVENUTTI KIM LLP
Jane Kim (#298192)
(jkim@kbkllp.com)
David A. Taylor (#247433)
(dtaylor@kbkllp.com)
Thomas B. Rupp (#278041)
(trupp@kbkllp.com)
650 California Street, Suite 1900
San Francisco, CA 94108
Tel: 415 496 6723
Fax: 650 636 9251

Attorneys for Debtors and Reorganized Debtors

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric
Company
☒ Affects both Debtors

** All papers shall be filed in the Lead
Case, No. 19-30088 (DM).*

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

**REORGANIZED DEBTORS' REPORT ON
RESPONSES TO TWENTY-FIRST
SECURITIES CLAIMS OMNIBUS
OBJECTION (DUPLICATE CLAIMS) AND
REQUEST FOR ORDER BY DEFAULT AS
TO UNOPPOSED OBJECTIONS**

[Re: Dkt. No. 12149]

**Resolving Objections Set for Hearing
May 24, 2022 at 10:00 a.m. (Pacific Time)**

1 **REQUEST FOR ENTRY OF ORDER BY DEFAULT**

2 PG&E Corporation (“**PG&E Corp.**”) and Pacific Gas and Electric Company (the “**Utility**”), as
3 debtors and reorganized debtors (collectively, the “**Debtors**” or the “**Reorganized Debtors**”) in the
4 above-captioned chapter 11 cases (the “**Chapter 11 Cases**”) hereby request, pursuant to Rule 9014-
5 1(b)(4) of the Bankruptcy Local Rules for the United States District Court for the Northern District of
6 California, as made applicable to these Chapter 11 Cases by the *Second Amended Order Implementing*
7 *Certain Notice and Case Management Procedures*, entered on May 14, 2019 [Docket No. 1996], that
8 the Court enter an order by default on the *Reorganized Debtors’ Twenty-First Securities Claims Omnibus*
9 *Objection (Duplicate Claims)* [Docket No. 12149] (the “**Twenty-First Securities Claims Omnibus**
10 **Objection**”).

11 **RELIEF REQUESTED IN THE**
12 **TWENTY-FIRST SECURITIES CLAIMS OMNIBUS OBJECTION**

13 The Twenty-First Securities Claims Omnibus Objection seeks to disallow and expunge certain
14 proofs of claim that duplicate others submitted in the Chapter 11 Cases. The claims subject to the
15 Twenty-First Securities Claims Omnibus Objection are listed in **Exhibit 1** to that Objection.

16 **NOTICE AND SERVICE**

17 The Reorganized Debtors filed the *Notice of Hearing on Reorganized Debtors’ Twenty-First*
18 *Securities Claims Omnibus Objection (Duplicate Claims)* [Docket No. 12151] (the “**Notice of**
19 **Hearing**”). The Twenty-First Securities Claims Omnibus Objection was supported by the *Declaration*
20 *of Justin R. Hughes in Support of Reorganized Debtors’ Twenty-First Securities Claims Omnibus*
21 *Objection (Duplicate Claims)* [Docket No. 12150] (the “**Hughes Declaration**”). The Twenty-First
22 Securities Claims Omnibus Objection, the Notice of Hearing, and the Hughes Declaration were served
23 as described in the *Certificate of Service* of Sonia Akter, filed on April 15, 2022 [Docket No. 12172]
24 (the “**Certificate of Service**”). As further described in the Certificate of Service, on April 12, 2022,
25 each holder of a claim listed on **Exhibit 1** to the Twenty-First Securities Claims Omnibus Objection
26 received a notice including the claim number, debtor, claim amount, and the basis for the Reorganized
27 Debtors’ objection with respect to the applicable claim to be disallowed and expunged.

The deadline to file responses or oppositions to the Twenty-First Securities Claims Omnibus Objection has passed. The Reorganized Debtors have received the following informal responses:

Docket No.	Claimant	Claim Nos.	Resolution
Informal	John Hancock Core Bond Fund	107657	Claimant has WITHDRAWN one of the two duplicate claims identified on the Twenty-First Securities Claims Omnibus Objection, and therefore the Twenty-First Securities Claims Omnibus Objection has been WITHDRAWN with respect to this claim.
Informal	John Hancock Core Bond Trust	107648, 107563, 107568, 107554, 107573, 107555, 107583	Claimant has WITHDRAWN the claims that are subject to the Twenty-First Securities Claims Omnibus Objection, and therefore the Twenty-First Securities Claims Omnibus Objection is MOOT as to these claims.
Informal	John Hancock Core Bond Trust	107576	Claimant has WITHDRAWN one of the two duplicate claims identified on the Twenty-First Securities Claims Omnibus Objection, and therefore the Twenty-First Securities Claims Omnibus Objection has been WITHDRAWN with respect to this claim.
Informal	John Hancock Core Bond Trust (JHCBT)	107741	Claimant has WITHDRAWN the claim that is subject to the Twenty-First Securities Claims Omnibus Objection, and therefore the Twenty-First Securities Claims Omnibus Objection is MOOT as to this claim.
Informal	Hartford Balanced HLS Fund	101964	Claimant has WITHDRAWN the claim that is subject to the Twenty-First Securities Claims Omnibus Objection, and therefore the Twenty-First Securities Claims Omnibus Objection is MOOT as to this claim.
Informal	Hartford Global Capital Appreciation Fund	102044	Claimant has WITHDRAWN the claim that is subject to the Twenty-First Securities Claims Omnibus Objection, and therefore the Twenty-First Securities Claims Omnibus Objection is MOOT as to this claim.

Docket No.	Claimant	Claim Nos.	Resolution
Informal	Hartford Global Real Asset Fund	101282	Claimant has WITHDRAWN the claim that is subject to the Twenty-First Securities Claims Omnibus Objection, and therefore the Twenty-First Securities Claims Omnibus Objection is MOOT as to this claim.
Informal	Hartford Multi Asset Income & Growth Fund	101993	Claimant has WITHDRAWN the claim that is subject to the Twenty-First Securities Claims Omnibus Objection, and therefore the Twenty-First Securities Claims Omnibus Objection is MOOT as to this claim.
Informal	Hartford Multifactor Low Volatility US Equity ETF	101328	Claimant has WITHDRAWN the claim that is subject to the Twenty-First Securities Claims Omnibus Objection, and therefore the Twenty-First Securities Claims Omnibus Objection is MOOT as to this claim.
Informal	Hartford Total Return Bond ETF	101958	Claimant has WITHDRAWN the claim that is subject to the Twenty-First Securities Claims Omnibus Objection, and therefore the Twenty-First Securities Claims Omnibus Objection is MOOT as to this claim.
Informal	Hartford Ultrashort Bond HLS Fund	102111	Claimant has WITHDRAWN the claim that is subject to the Twenty-First Securities Claims Omnibus Objection, and therefore the Twenty-First Securities Claims Omnibus Objection is MOOT as to this claim.
Informal	HIMCO Duration Matched Division Ser II	102069	Claimant has WITHDRAWN the claim that is subject to the Twenty-First Securities Claims Omnibus Objection, and therefore the Twenty-First Securities Claims Omnibus Objection is MOOT as to this claim.
Informal	HIMCO US Aggregate Bond Index Division	102003	Claimant has WITHDRAWN the claim that is subject to the Twenty-First Securities Claims Omnibus Objection, and therefore the Twenty-First Securities Claims Omnibus Objection is MOOT as to this claim.

Docket No.	Claimant	Claim Nos.	Resolution
Informal	Himco Vit Index Fund	102107	Claimant has WITHDRAWN the claim that is subject to the Twenty-First Securities Claims Omnibus Objection, and therefore the Twenty-First Securities Claims Omnibus Objection is MOOT as to this claim.
Informal	HIMCO VIT Portfolio Diversifier Fund	102062	Claimant has WITHDRAWN the claim that is subject to the Twenty-First Securities Claims Omnibus Objection, and therefore the Twenty-First Securities Claims Omnibus Objection is MOOT as to this claim.
Informal	The Hartford Global All-Asset Fund	102001	Claimant has WITHDRAWN the claim that is subject to the Twenty-First Securities Claims Omnibus Objection, and therefore the Twenty-First Securities Claims Omnibus Objection is MOOT as to this claim.
Informal	The Hartford Strategic Income Fund	102027	Claimant has WITHDRAWN the claim that is subject to the Twenty-First Securities Claims Omnibus Objection, and therefore the Twenty-First Securities Claims Omnibus Objection is MOOT as to this claim.
Informal	The Hartford Total Return Bond Fund	101956	Claimant has WITHDRAWN the claim that is subject to the Twenty-First Securities Claims Omnibus Objection, and therefore the Twenty-First Securities Claims Omnibus Objection is MOOT as to this claim.
Informal	Russell 1000 Value Index Trust Fund	102529	Claimant has WITHDRAWN the claim that is subject to the Twenty-First Securities Claims Omnibus Objection, and therefore the Twenty-First Securities Claims Omnibus Objection is MOOT as to this claim.
Informal	Vanguard Annuity Equity Index Fund	102492	Claimant has WITHDRAWN the claim that is subject to the Twenty-First Securities Claims Omnibus Objection, and therefore the Twenty-First Securities Claims Omnibus Objection is MOOT as to this claim.

Docket No.	Claimant	Claim Nos.	Resolution
Informal	Vanguard CA Intermediate Term Tax Exempt Fund	102497	Claimant has WITHDRAWN the claim that is subject to the Twenty-First Securities Claims Omnibus Objection, and therefore the Twenty-First Securities Claims Omnibus Objection is MOOT as to this claim.
Informal	Vanguard CA Long Term Tax Exempt Fund	102549	Claimant has WITHDRAWN the claim that is subject to the Twenty-First Securities Claims Omnibus Objection, and therefore the Twenty-First Securities Claims Omnibus Objection is MOOT as to this claim.
Informal	Vanguard CA Tax Exempt Money Market	102495	Claimant has WITHDRAWN the claim that is subject to the Twenty-First Securities Claims Omnibus Objection, and therefore the Twenty-First Securities Claims Omnibus Objection is MOOT as to this claim.
Informal	Vanguard Capital Value Fund	102547	Claimant has WITHDRAWN the claim that is subject to the Twenty-First Securities Claims Omnibus Objection, and therefore the Twenty-First Securities Claims Omnibus Objection is MOOT as to this claim.
Informal	Vanguard Equity Income	102560	Claimant has WITHDRAWN the claim that is subject to the Twenty-First Securities Claims Omnibus Objection, and therefore the Twenty-First Securities Claims Omnibus Objection is MOOT as to this claim.
Informal	Vanguard Equity Income Annuity Fund	102563	Claimant has WITHDRAWN the claim that is subject to the Twenty-First Securities Claims Omnibus Objection, and therefore the Twenty-First Securities Claims Omnibus Objection is MOOT as to this claim.
Informal	Vanguard Growth and Income Fund	102562	Claimant has WITHDRAWN the claim that is subject to the Twenty-First Securities Claims Omnibus Objection, and therefore the Twenty-First Securities Claims Omnibus Objection is MOOT as to this claim.

Docket No.	Claimant	Claim Nos.	Resolution
Informal	Vanguard Growth and Income Fund	101817	Claimant has WITHDRAWN the claim that is subject to the Twenty-First Securities Claims Omnibus Objection, and therefore the Twenty-First Securities Claims Omnibus Objection is MOOT as to this claim.
Informal	Vanguard Growth and Income Fund	102538	Claimant has WITHDRAWN the claim that is subject to the Twenty-First Securities Claims Omnibus Objection, and therefore the Twenty-First Securities Claims Omnibus Objection is MOOT as to this claim.
Informal	Vanguard Index 500 Fund	102507	Claimant has WITHDRAWN the claim that is subject to the Twenty-First Securities Claims Omnibus Objection, and therefore the Twenty-First Securities Claims Omnibus Objection is MOOT as to this claim.
Informal	Vanguard Instit. Total Stock Market Index Fund	102448	Claimant has WITHDRAWN the claim that is subject to the Twenty-First Securities Claims Omnibus Objection, and therefore the Twenty-First Securities Claims Omnibus Objection is MOOT as to this claim.
Informal	Vanguard Institutional Index Fund	102509	Claimant has WITHDRAWN the claim that is subject to the Twenty-First Securities Claims Omnibus Objection, and therefore the Twenty-First Securities Claims Omnibus Objection is MOOT as to this claim.
Informal	Vanguard Institutional Short-Term Bond Fund	102566	Claimant has WITHDRAWN the claim that is subject to the Twenty-First Securities Claims Omnibus Objection, and therefore the Twenty-First Securities Claims Omnibus Objection is MOOT as to this claim.
Informal	Vanguard Large Cap Index Fund	102573	Claimant has WITHDRAWN the claim that is subject to the Twenty-First Securities Claims Omnibus Objection, and therefore the Twenty-First Securities Claims Omnibus Objection is MOOT as to this claim.

Docket No.	Claimant	Claim Nos.	Resolution
Informal	Vanguard Limited Term Tax Exempt Fund	102576	Claimant has WITHDRAWN the claim that is subject to the Twenty-First Securities Claims Omnibus Objection, and therefore the Twenty-First Securities Claims Omnibus Objection is MOOT as to this claim.
Informal	Vanguard Mega Cap Index Fund	102578	Claimant has WITHDRAWN the claim that is subject to the Twenty-First Securities Claims Omnibus Objection, and therefore the Twenty-First Securities Claims Omnibus Objection is MOOT as to this claim.
Informal	Vanguard Mega Cap Value Index Fund	102500	Claimant has WITHDRAWN the claim that is subject to the Twenty-First Securities Claims Omnibus Objection, and therefore the Twenty-First Securities Claims Omnibus Objection is MOOT as to this claim.
Informal	Vanguard Municipal Cash Management Fund	102499	Claimant has WITHDRAWN the claim that is subject to the Twenty-First Securities Claims Omnibus Objection, and therefore the Twenty-First Securities Claims Omnibus Objection is MOOT as to this claim.
Informal	Vanguard Precious Metals & Mining Fund	102580	Claimant has WITHDRAWN the claim that is subject to the Twenty-First Securities Claims Omnibus Objection, and therefore the Twenty-First Securities Claims Omnibus Objection is MOOT as to this claim.
Informal	Vanguard Russell 1000 Index Fund	102454	Claimant has WITHDRAWN the claim that is subject to the Twenty-First Securities Claims Omnibus Objection, and therefore the Twenty-First Securities Claims Omnibus Objection is MOOT as to this claim.
Informal	Vanguard Russell 1000 Value Index Fund	102583	Claimant has WITHDRAWN the claim that is subject to the Twenty-First Securities Claims Omnibus Objection, and therefore the Twenty-First Securities Claims Omnibus Objection is MOOT as to this claim.

Docket No.	Claimant	Claim Nos.	Resolution
Informal	Vanguard Russell 3000 Index Fund	102315	Claimant has WITHDRAWN the claim that is subject to the Twenty-First Securities Claims Omnibus Objection, and therefore the Twenty-First Securities Claims Omnibus Objection is MOOT as to this claim.
Informal	Vanguard Selected Value Fund	102585	Claimant has WITHDRAWN the claim that is subject to the Twenty-First Securities Claims Omnibus Objection, and therefore the Twenty-First Securities Claims Omnibus Objection is MOOT as to this claim.
Informal	Vanguard Short Term Bond Index Fund	102587	Claimant has WITHDRAWN the claim that is subject to the Twenty-First Securities Claims Omnibus Objection, and therefore the Twenty-First Securities Claims Omnibus Objection is MOOT as to this claim.
Informal	Vanguard Short-Term Corporate Bond Index Fund	102311	Claimant has WITHDRAWN the claim that is subject to the Twenty-First Securities Claims Omnibus Objection, and therefore the Twenty-First Securities Claims Omnibus Objection is MOOT as to this claim.
Informal	Vanguard Tax Managed Capital Appreciation Fund	102588	Claimant has WITHDRAWN the claim that is subject to the Twenty-First Securities Claims Omnibus Objection, and therefore the Twenty-First Securities Claims Omnibus Objection is MOOT as to this claim.
Informal	Vanguard Tax-Managed Balanced-Equity	102458	Claimant has WITHDRAWN the claim that is subject to the Twenty-First Securities Claims Omnibus Objection, and therefore the Twenty-First Securities Claims Omnibus Objection is MOOT as to this claim.
Informal	Vanguard Total Stock Market Index Fund	102593	Claimant has WITHDRAWN the claim that is subject to the Twenty-First Securities Claims Omnibus Objection, and therefore the Twenty-First Securities Claims Omnibus Objection is MOOT as to this claim.

Docket No.	Claimant	Claim Nos.	Resolution
Informal	Vanguard Total World Stock Index Fund	102594	Claimant has WITHDRAWN the claim that is subject to the Twenty-First Securities Claims Omnibus Objection, and therefore the Twenty-First Securities Claims Omnibus Objection is MOOT as to this claim.
Informal	Vanguard U.S. Value Fund	102603	Claimant has WITHDRAWN the claim that is subject to the Twenty-First Securities Claims Omnibus Objection, and therefore the Twenty-First Securities Claims Omnibus Objection is MOOT as to this claim.
Informal	Vanguard Ultra-Short-Term Bond Fund	102309	Claimant has WITHDRAWN the claim that is subject to the Twenty-First Securities Claims Omnibus Objection, and therefore the Twenty-First Securities Claims Omnibus Objection is MOOT as to this claim.
Informal	Vanguard US Value Factor ETF	102597	Claimant has WITHDRAWN the claim that is subject to the Twenty-First Securities Claims Omnibus Objection, and therefore the Twenty-First Securities Claims Omnibus Objection is MOOT as to this claim.
Informal	Vanguard Utilities Index Fund	102598	Claimant has WITHDRAWN the claim that is subject to the Twenty-First Securities Claims Omnibus Objection, and therefore the Twenty-First Securities Claims Omnibus Objection is MOOT as to this claim.
Informal	Vanguard Value Index Fund	102299	Claimant has WITHDRAWN the claim that is subject to the Twenty-First Securities Claims Omnibus Objection, and therefore the Twenty-First Securities Claims Omnibus Objection is MOOT as to this claim.
Informal	Vanguard Windsor Fund	102289	Claimant has WITHDRAWN the claim that is subject to the Twenty-First Securities Claims Omnibus Objection, and therefore the Twenty-First Securities Claims Omnibus Objection is MOOT as to this claim.

Docket No.	Claimant	Claim Nos.	Resolution
Informal	Vanguard Windsor Fund	102291	Claimant has WITHDRAWN the claim that is subject to the Twenty-First Securities Claims Omnibus Objection, and therefore the Twenty-First Securities Claims Omnibus Objection is MOOT as to this claim.
Informal	William McGovern IRA Charles Schwab Cust	104029	The Reorganized Debtors have filed a Notice of Continued Hearing with respect to this claim, further extending the hearing to June 29, 2022.

DECLARATION OF NO OPPOSITION RECEIVED

The undersigned hereby declares, pursuant to 28 U.S.C. § 1746, under penalty of perjury that:

1. I am a member of the law firm of Weil, Gotshal & Manges LLP (“**Weil**”), counsel for the Reorganized Debtors.

2. The Court’s docket in the Chapter 11 Cases has been reviewed and Weil has determined that no responses have been filed with respect to the Twenty-First Securities Claims Omnibus Objection except as described herein.

WHEREFORE, the Reorganized Debtors hereby request entry of an order disallowing and expunging the proofs of claim listed in the column headed “Claim(s) to be Disallowed and Expunged” in **Exhibit A** to this Request, which listed claims identical to those in **Exhibit 1** to the Twenty-First Securities Claims Omnibus Objection, except as otherwise discussed above.

Dated May 17, 2022

WEIL, GOTSHAL & MANGES LLP

KELLER BENVENUTTI KIM LLP

By: /s/ Richard W. Slack

Richard W. Slack

Attorneys for Debtors and Reorganized Debtors